## Case: 1:17-md-02804-DAP Doc #: 1976-16 Filed: 07/24/19 1 of 72. PageID #: 220751

Highly Confidential - Subject to Further Confidentiality Review

Page 1 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION -----IN RE: NATIONAL PRESCRIPTION OPIATE ) MDL No. 2804 LITIGATION ) Case No. ) 1:17-MD-2804 THIS DOCUMENT RELATES TO ) Hon. Dan A. Polster ALL CASES HIGHLY CONFIDENTIAL SUBJECT TO FURTHER CONFIDENTIALITY REVIEW VIDEOTAPED DEPOSITION OF CHRISTOPHER DOMZALSKI January 17, 2019 Chicago, Illinois GOLKOW LITIGATION SERVICES 877.370.3377 ph | 917.591.5672 fax deps@golkow.com

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audit, correct?

A. Yes.

Walgreens' responsibility as a distributor for

Schedule II and Schedule III when performing your

An	DACIED		rage 130
		1	MR. HOUTZ: Object to form.
		2	THE WITNESS: I'm sorry.
		3	BY THE WITNESS:
		4	A. Yes, and, again, I would say the
		5	combination of the policy along with those
		6	discussions with legal and with the management
		7	team.
		8	BY MR. MOUGEY:
		9	Q. Sir, if you turn the page, and you see
		10	in the middle the cite to 21 CFR 1301.74. It's the
		11	same section we just read.
		12	Do you see that, sir?
		13	A. Sorry. Where at?
		14	Q. In the middle of the page, the block
		15	quote.
		16	A. Yes, yes.
		17	Q. It's the same section of the federal
		18	regs that we just reviewed together, right?
		19	A. Yes.
		20	Q. Do you see the sentence that, "It bears
		21	emphasis that the foregoing reporting requirement
		22	is in addition to, and not in lieu of, the general
		23	requirement under 21 U.S.C. Section 823(e)."
		24	Do you see that, sir?
Т	Page 15	5	Page 157
1	A. And react to it.	1	A. Yes.
2	Q and then take their policy and	2	Q. The next paragraph, "Thus, in addition
3	procedure manuals and incorporate that direction	3	to reporting all suspicious orders, a distributor
4	from the DEA into its day-to-day manuals, correct?	4	has a statutory responsibility to exercise due
5	A. My assumption would be that they would	5	diligence to avoid filling suspicious orders."
6	react to it.	6	Do you see that, sir?
7	Q. And I understand. We have said it's	7	A. Yes.
8	important and we've said that it's reacting to it,	8	Q. All right. Now, let's stop for a
9	but what I asked was a little bit different.	9	second.
10	What I asked was: They would take the	10	Do you have an understanding, just
11	direction from the DEA and make sure that that	11	generally, of what due diligence means?
12	information was included in its policies and	12	A. Generally, yes.
13	procedures, correct?	13	Q. What is your understanding generally of
14	MR. HOUTZ: Object to form.	14	what due diligence means?
15	BY THE WITNESS:	15	A. Take actions to ensure, perform some
16	A. Yes, I would expect that.	16	kind of review or evaluation.
17	BY MR. MOUGEY:	17	Q. Let's take it in the context of the
18	Q. So, the fact that you expected that,	18	internal audit group, your group. Okay.
19	your group was relying on the policies and	19	Your group's due diligence would mean
20	procedures that Walgreens had in the context of	20	explaining what you've told me today, that when
	- TTT 1 1 11 11 11 11 11 11 11 11 11 11 1	0.1	1 4 11 777 1 1 11 11 11 11

understanding Walgreens' responsibilities as a

distributor, you met with distribution center

management, correct?

A. Partially, yep.

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	Page 158		Page 160
. 1	Q. And you also met with regulatory and	1	(WHEREUPON, a certain document was
2	legal, correct?	2	marked as Walgreens-Domzalski
3	A. We did.	3	Exhibit No. 8: 2/7/07 letter from
4	Q. You also looked at Walgreens' policies	4	U.S. DOJ DEA; ABDCMDL00269687 -
5	and procedure manuals, correct?	5	0026960.)
6	A. Correct.	6	BY MR. MOUGEY:
7	Q. You also performed or interviewed	7	Q. What I want you to do is just
8	employees at Walgreens, correct?	8	(Clarification requested by the
9	A. Correct.	9	reporter.)
10	Q. And I'm assuming that your group would	10	MR. MOUGEY: I'm sorry.
11	typically also look at some documentation from	11	MS. SCHUCHARDT: Counsel, this appears to be
12	Walgreens, correct?	12	an AmerisourceBergen document that's confidential.
13	A. Correct.	13	I have not been apprised that we have given
14	Q. That's that could be referred to as	14	authority to show it to a Walgreens employee.
15	internal audit performing due diligence, correct,	15	MR. MOUGEY: I have used this document in
16	sir?	16	about ten depositions at this point. It's a
17	A. Yes.	17	general form letter sent to every single registrant
18	Q. Yes. So, in the context here, due	18	in the United States, and it's the it says right
19	diligence wouldn't be a foreign concept in that	19	on the first sentence, "This letter is being sent
20	Walgreens as a distributor has a statutory	20	to every commercial entity in the United States
21	responsibility to exercise due diligence to avoid	21	registered with the Drug Enforcement Agency to
22	filling suspicious orders, right?	22	distribute controlled substances."
23	A. Say that again.	23	MS. SCHUCHARDT: Be that as it may, I have an
24	Q. That you understand the context of due	24	obligation to request if we can give permission.
	Page 159		Page 161
1	diligence in this sentence that Walgreens has a	1	Can you use another document in the meantime?
2	diligence in this sentence that Walgreens has a statutory responsibility before it fills suspicious		Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another
	diligence in this sentence that Walgreens has a	1	Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another document. Would it be okay with you is if you
2	diligence in this sentence that Walgreens has a statutory responsibility before it fills suspicious orders to exercise due diligence, correct?  A. Yes.	1 2	Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another document. Would it be okay with you is if you didn't waive any of your objections and if there is
2 3 4 5	diligence in this sentence that Walgreens has a statutory responsibility before it fills suspicious orders to exercise due diligence, correct?  A. Yes.  Q. Now, let's go back to Domzalski 3. Can	1 2 3 4 5	Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another document. Would it be okay with you is if you didn't waive any of your objections and if there is any problem with us, that you have kept all your
2 3 4 5 6	diligence in this sentence that Walgreens has a statutory responsibility before it fills suspicious orders to exercise due diligence, correct?  A. Yes.  Q. Now, let's go back to Domzalski 3. Can you tell me in the scope of this internal audit	1 2 3 4 5 6	Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another document. Would it be okay with you is if you didn't waive any of your objections and if there is any problem with us, that you have kept all your rights under whatever the privilege or protective
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2 3 4 5 6 7 8 9	diligence in this sentence that Walgreens has a statutory responsibility before it fills suspicious orders to exercise due diligence, correct?  A. Yes.  Q. Now, let's go back to Domzalski 3. Can you tell me in the scope of this internal audit whether or not your group looked to determine whether or not Walgreens fulfilled its statutory responsibility to exercise due diligence before	1 2 3 4 5 6 7 8	Can you use another document in the meantime?  MR. MOUGEY: I don't have access to another document. Would it be okay with you is if you didn't waive any of your objections and if there is any problem with us, that you have kept all your rights under whatever the privilege or protective order is, that we are not waiving anything by letting us use this today?  MS. SCHUCHARDT: Go ahead.
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Page 162 Page 164 Q. So, all within a matter of approximately 1 1 paragraph. 2 Would you just compare. Generally 2 14 months, 15 months? 3 3 Exhibits 7 and 8 appear to be very similar or A. Yes. 4 almost identical. 4 Q. And, again, the second sentence of 9, 5 5 Exhibit 9, says, "The purpose of this letter is to A. Yes, they appear to be -- from what I б can tell, yeah, they look pretty similar. 6 reiterate the responsibilities of controlled 7 7 substance manufacturers and distributors to inform Q. Again, I know you didn't have time to 8 review every single word but they're very similar, 8 DEA of suspicious orders in accordance with 21 9 correct? 9 CFR." 10 A. They look similar. 10 Correct? 11 Q. So, now, sir, as part of or chief 11 A. I'm sorry. I lost you on that. Where director of internal audit at Walgreens, do you 12 12 are you at? 13 recall seeing this February 7, 2007 letter as part 13 Q. The second sentence of the first 14 of the -- your group's internal audit of the 14 paragraph. 15 distribution centers? 15 A. First paragraph. Okay. 16 A. I don't recall seeing this document. 16 "The purpose of this letter is to 17 17 reiterate the responsibilities of controlled Just to make sure I'm not missing 18 something, you don't recall in the last two 18 substance manufacturers and distributors to inform 19 exhibits, 7 and 8, seeing any synopsis or bullets 19 DEA of suspicious orders in accordance with 21 CFR 1301.74(b)." 20 or anything that captures the content in Exhibits 7 20 21 or 8 when performing the audit, correct? 21 Correct? 22 22 A. I certainly don't recall that, no. A. Yes. 23 Q. All right. Let me hand you what I will 23 Q. Now, just to quickly look over --24 mark as Domzalski 9. 24 quickly review this document. Page 163 Page 165 1 (WHEREUPON, a certain document was 1 The second paragraph, do you see the 2 2 marked as Walgreens-Domzalski second sentence indicates that DEA regs require all 3 Exhibit No. 9: 12/27/07 letter 3 distributors to report suspicious orders of 4 from U.S. DOJ DEA; MCKMDL00478910 -4 controlled substances, right? 5 5 00478911.) A. Yes. б BY MR. MOUGEY: б Q. And I'm assuming the answer to this next 7 Q. Do you see the date on this, sir, 7 question is the same as before, that you can't December 27, 2007? 8 discern from the internal audit report whether your 8 9 A. Yes, I do. 9 group's audit covered Walgreens' responsibility to 10 Q. And we've now -- the first sentence, 10 identify suspicious orders, right? 11 "This letter is being sent to every entity in the 11 A. No, I cannot recall that. 12 United States registered with the Drug Enforcement 12 Q. And --13 Administration to manufacture or distribute 13 A. Cannot identify it from the report. controlled substances." 14 Q. You'll see here -- let's go down to the 14 15 Correct? 15 third paragraph. 16 A. Yes. A. Yes. 16 17 Q. And your understanding is, again, that 17 Q. "The regulation also requires the would include Walgreens? registrant inform the local DEA Division Office of 18 18 19 A. Yes. 19 suspicious orders when discovered by the 20 Q. So, we've now seen correspondence from 20 registrant." 21 the U.S. Department of Justice DEA from 21 Sir, is it safe to conclude that you 22 September 27, 2006, February 7, 2007 and then a 22 can't tell from looking at this internal audit, 23 third letter, December 27, 2007, correct, sir? 23 meaning Exhibit 3, whether or not the excessive 24 24 Yes. purchase reports or suspicious order reports were

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Page 166 Page 168 sent when discovered by Walgreens? calls such reports 'suspicious order reports.'" 1 1 2 A. No, you can't tell. 2 Is it safe to conclude, sir, that the 3 3 audit as Exhibit 3, we don't know whether or not Q. And, sir, the next sentence, "Filing a your group determined whether the reports were 4 monthly report of completed transactions 4 5 5 ('excessive purchase report' or 'high unit daily, weekly or monthly, correct? б purchases') does not meet the regulatory 6 A. Correct. You can't tell from the words. 7 7 requirement to suspicious orders." Q. Sir, the directors that worked, the five 8 There was no -- you can't tell whether 8 directors that worked for you. 9 or not your group, the internal audit report, 9 A. Yes. analyzed whether or not Walgreens was fulfilling 10 10 Q. Just on average, what were their annual 11 its obligations with the type of reporting it was salaries? 11 12 providing to the DEA? 12 A. Maybe in the \$150,000 range. 13 A. No, I can't tell that. 13 O. 150? 14 Q. Sir, if you skip a sentence, the next 14 A. Base salary. sentence says, "Registrants must conduct an 150,000 range. I'm assuming yours was 15 15 16 independent analysis." 16 more than 150? 17 Do you see where I am? 17 A. Yes. 18 A. Yes, I do. 18 Q. In between 2 and 300? 19 Q. "Registrants must conduct an independent 19 Probably closer to 2. 200,000. 20 analysis of suspicious orders prior to completing a 20 Closer to 2. So, the five directors 21 sale to determine whether the controlled substances 21 that you had performing these audit reports, 22 22 are likely to be diverted from legitimate Walgreens believed in enough, with their expertise 23 channels." 23 and sophistication, that they would make about 150 24 24 grand, correct? Did I read that right? Page 167 Page 169 1 A. Yes, you did. 1 A. Can you repeat the question? I don't 2 2 Q. And you can't tell looking at the scope know if I understood it. 3 of the audit in Exhibit 3 whether or not your group 3 MR. MOUGEY: I will tell you what. Let's stop 4 determined whether or not Walgreens was conducting 4 there for lunch, if that's all right. 5 THE VIDEOGRAPHER: We are off the record at 5 an independent analysis of suspicious orders prior б to completing the sale, correct, sir? б 12:32 p.m. 7 A. No, I cannot tell that. 7 (WHEREUPON, a recess was had 8 from 12:32 to 1:20 p m.) 8 Q. If you turn to the second page, sir, the 9 back of it. The sentence that begins with 9 THE VIDEOGRAPHER: We are back on the record 10 "Registrants that rely on rigid formulas to define 10 at 1:20 p m. 11 whether an order is suspicious may be failing to 11 BY MR. MOUGEY: 12 detect suspicious orders." 12 O. Mr. Domzalski, are there -- is there a 13 Do you see that, sir? 13 shared drive at Walgreens that during your tenure that has a list of all of the different audits that 14 A. Yes, I do. 14 15 Q. Sir, is it safe to conclude that we 15 were performed? A. I don't know if it has a list. I 16 can't tell from the scope of the internal audit 16 17 report whether or not Walgreens was using a rigid 17 think -- I think it has probably some folder formula to identify suspicious orders? mechanism that would capture individual audits 18 18 19 A. That's correct. You can't tell. 19 performed, and I don't recall if it's by year or by 20 area. I don't remember what the structure of the 20 Q. And if you go to the next paragraph, the 21 second sentence, "Daily, weekly, or monthly reports 21 shared drives would be in. 22 submitted by a registrant indicating 'excessive 22 Q. But it's your recollection, irrespective 23 purchases' do not comply with the requirement to 23 of the shared drive, that Walgreens has a mechanism 24 report suspicious orders, even if the registrant 24 to capture what audits were performed and what

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Page 170 Page 172 Q. It's dated July 17, 2012, and if you 1 department? 1 2 A. Yes, absolutely. 2 see -- you know how sometimes you have PowerPoint 3 3 and you have talking points below? Q. All right. Do you have an independent 4 recollection of, during your tenure, how many 4 Yes. 5 audits were performed on the distribution centers 5 Q. That's what this appears to be, right? 6 in relation to the Controlled Substance Act 6 A. Yes. 7 7 Schedule II, Schedule III opiates? All right. Have you seen this before, 8 A. No, I don't. 8 just the first -- do you recall? 9 Q. Let's broaden that out. 9 A. No, I don't recall seeing this. 10 10 Q. So, you'll see the notes that it -- "We Do you have any recollection sitting 11 here how many audits were performed on the want to work with you. We want to cooperate and 11 12 distribution centers generally? 12 avoid litigation." It appears to be communication 13 A. No, I do not. 13 between Walgreens and some regulator. 14 Q. Do you have an understanding of the 14 So, where I want to direct your frequency of how often audits were to be performed attention is Bates No. 19. On Bates No. 19, under 15 15 16 on distribution centers? 16 the "Audit program." Do you see that? 17 A. Not specifically. I would, again, best 17 A. Yes. 18 recollection would be that we would have had them 18 Q. All right. Now, do you see that the 19 on some kind of rotational basis, but I don't 19 first entrants under "Audit program" is "Mini-audits"? 20 honestly recall what that rotational basis would 20 21 have been. 21 A. Yes. 22 22 Q. Do you have -- I'm sorry. Q. And as you testified earlier, 23 Do you have a recollection of just a 23 "Distribution center conduct mini-audits in order 24 24 to ensure that the handling of Schedule II to V typical frequency? Page 171 Page 173 1 A. No, I don't, especially in the broader 1 controlled substance complies with DEA 2 2 picture of the audits, a lot of the audits we were regulations." 3 doing, they may have been first-time audits of that 3 Do you see that? 4 specific -- of a specific area. So, it wasn't like 4 A. I see that. 5 5 all audits were subject to a rotational basis, but Q. "The audit reviews registration, б I think the -- my expectation would have been that б security, employee screening, inventory 7 the DC audits would have been on some more formal 7 requirements, recordkeeping and reporting." 8 8 rotational basis. Do you see that? 9 Q. I'm going to hand you what we're going 9 A. Yes, I do. to mark as Domzalski 10. 10 10 Q. Okay. Now, below that is the "Internal 11 (WHEREUPON, a certain document was 11 audits," and the internal audit is what you and I 12 marked as Walgreens-Domzalski 12 were just reviewing under as Exhibit 3. Okay? 13 Exhibit No. 10: PowerPoint, 13 A. Yes. 14 "Walgreen Co. Controlled Substance 14 Q. Now, do you see the reference 15 Anti-Diversion and Compliance 15 "Distribution centers undergo more thorough audits 16 Program"; WAGMDL0000659801 -16 every three to five years in order to ensure that 17 00659856.) 17 the handling of Schedule II to V controlled 18 BY MR. MOUGEY: 18 substances complies with DEA regs"? 19 19 Q. And it's WAGMDL659803. This appears to A. Yes. 20 be a PowerPoint. First page is titled "Walgreen 20 Q. Does that comport with your general 21 Company Controlled Substance Anti-Diversion and 21 recollection of how frequent the internal audits 22 Compliance Program." 22 were conducted on the distribution centers? 23 Do you see that on the first slide? 23 A. It certainly sounds like a reasonable 24 Yes, I do. 24 period of time, yes.

Page 174 REDACTED

- 1 Q. So, during the time -- do you have --
- 2 that you were at Walgreens, do you have a
- 3 recollection, at least up until the end of '14,
- 4 that there were three distribution centers at
- 5 Walgreens that handled Schedule II and III opiates?
- 6 A. So, I don't remember specific numbers,
- 7 but I remember there were differentiations between
- 8 the DCs in terms of what products they handled and
- 9 that certainly only certain of those DCs handled
- 10 Schedule --
- 11 Q. So -- I'm sorry.
- 12 A. Yeah.
- Q. At least according to this entry and
- 14 your general recollection, we should -- we should
- 15 have in our -- there should have been one or two
- audits during your tenure of the distribution
- 17 centers while you were at Walgreens. Does that
- 18 make sense?
- 19 A. That's --
- 20 MR. HOUTZ: Object to form, foundation.
- 21 BY THE WITNESS:
- A. It makes logical sense to me, yes.
- 23 BY MR. MOUGEY:
- Q. Okay. Who would know that? Where would

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- 1 we go to know for sure? We have a PowerPoint. You
- 2 don't have a specific recollection. But I think
- 3 you said that that generally comports with your
- 4 recollection of three to five years.
- 5 Where would we know for sure? Where
- 6 would we go to look of how frequent the internal
  - audits were of the distribution centers?
- 8 A. Probably for sure in the shared drive
- 9 would be, again, some record of -- I don't know,
- again, what form you'd have to take, but certainly
- 11 the data would be there.
  - Q. All right.
- A. I don't know if there is better
- 14 locations.

7

12

- Q. Let me broaden that question up.
- Is there a -- and I apologize because I
- 17 think you told me this earlier.
- But what was the catalyst or initiation
- 19 of an audit where they -- was someone in your
- 20 group? Did someone keep track of how often the
- 21 audits would occur? Or just tell me what the
- 22 genesis of an audit was.
- 23 A. So, I think there is -- I think you have
- 24 to look at it, step up to the overall audit

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